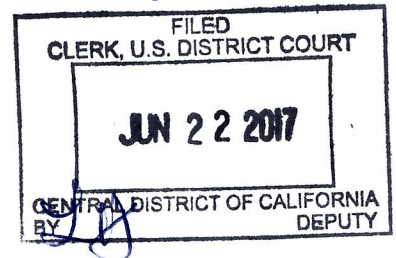


UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA



THENG KHIM

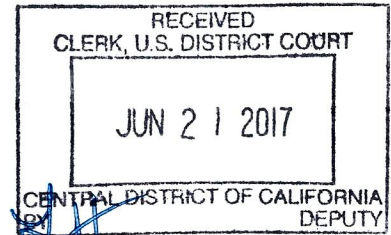
,
Plaintiff,

Case No. CV 17-01245 BRO (FFM)

v.

GC SERVICES LIMITED PARTNERSHIP
6330 Gulfton
Houston, TX 77081

,
Defendant. /



COMPLAINT

Plaintiff Theng Khim ("Khim"), files this complaint alleging that Defendant violated the Federal Debt Collection Procedures Act (F.D.C.P.A.) and respectfully shows the Court the following:

JURISDICTION AND VENUE

This Court has federal question jurisdiction over this action pursuant to 28 U.S.C. § 1331 because this is a Civil Action arising out of the violation of federal laws. Venue is proper because a substantial part of the events giving rise to Plaintiff's claims occurred in this judicial district.

CLAIM

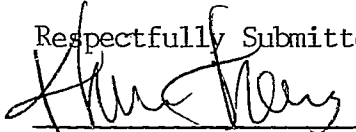
Plaintiff submits that Defendant violated Section 1692(g)(b) of the F.D.C.P.A. which requires a debt collector who received a consumer written notice disputing a debt, to cease collection of the debt directly from the consumer until it has obtained either verification of the debt or a copy of a judgement and provided it to the consumer. In this case, in February of 2017, Plaintiff made a written request to Defendant to validate the alleged debt. Defendant never responded to Plaintiff requesting validation, however, on April 2, 2017 Defendant mailed out another letter attempting to collect the debt. See Exhibit No. 1. This was a clear violation of the F.D.C.P.A. Section 1692(g).

DAMAGES

Plaintiff seeks the maximum statutory damages under the FDCPA of \$1,000; \$1,000 for violating California Civil Code §1785.25(a), and \$1,000 under the FDCPA California Civil Code § 1788.17 for a total of \$3,000.

Dated : June 18, 2017

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Theng Khim', written over a horizontal line.

Theng Khim

Reg No. 35945-086

EXHIBIT 1

Collection Letter from GC Services Limited Partnership
Dated April 2, 2017

CDGCSV80 050
PO Box 1022
Wixom MI 48393-1022
ADDRESS SERVICE REQUESTED



GC Services Limited Partnership
6330 Gulfport, Houston, TX 77081



Please call: 800-611-2131 (English)
800-616-6007 (Español)
800-431-7174 (TDD)

April 2, 2017



USE ENCLOSED ENVELOPE AND SEND PAYMENT TO:

391434096



Theng Khim
1213 S Donovan St
Seattle WA 98108-4836

PO BOX 7820
BALDWIN PARK CA 91706

YOU OWE: **THE SUPERIOR COURT OF CALIFORNIA COUNTY OF FRESNO**
ACCOUNT NUMBER: **WAKHIMT256K**

FILE NUMBER: **3069320**
BALANCE DUE: **\$1,060.00**

PLEASE DETACH AND RETURN UPPER PORTION OF STATEMENT WITH PAYMENT

April 2, 2017

File Number: 3069320
Account Number: WAKHIMT256K

Dear THENG KHIM,

As of the above-referenced date, we have not heard from you concerning your outstanding balance. Your driving privileges may have already been adversely affected.

You should take this opportunity to contact us at 800-611-2131 (English) or 800-616-6007 (Español). Our office hours are Mon-Thur 8am – 9pm, Fri 8am – 7pm, Sat 8am – Noon, Sun 11am – 7pm PST.

By contacting us at this time to resolve your unpaid bail, you will avoid further methods of collection by the court, which may include:

- The Department of Motor Vehicles (DMV) may suspend your driving privileges.
- And if you are driving on a suspended license a misdemeanor violation may be charged against you.
- And the vehicle you are driving may be impounded.

To avoid further collection activity, make your check or money order payable to "THE SUPERIOR COURT OF CALIFORNIA, COUNTY OF FRESNO" and return it with the top portion of this notice in the enclosed window envelope.

CITATION NO.	DATE	AMOUNT
0700-B01002986-8	03/01/2001	\$1,060.00

Sincerely,
Hugo Andrade
Account Representative

Sírvase ver al dorso la traducción al español

NOTICE: SEE REVERSE SIDE FOR IMPORTANT CONSUMER INFORMATION

NOTA: VEA AL DORSO IMPORTANTE INFORMACIÓN AL CONSUMIDOR

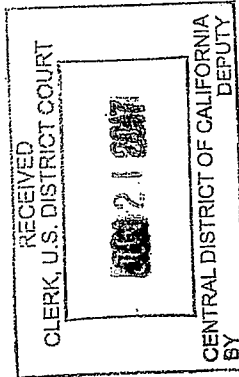
GC Services Limited Partnership – Collection Agency Division – 6330 Gulfport, Houston, TX 77081
0407-50 OCH-2D 357902147000083 36384534

Theng, Khim
Reg No.
Federal Correctional Institution
FCI Victorville Medium II
PO Box 3850
Adelanto, CA 92301

SN PERMARDINO CA 924

19 JUN 2017 PM 7 L

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
CLERK OF THE COURT
ROOM G-8
312 North Spring Street
Los, Angeles, CA 92301



50012-209579

regal mail

regal